



THE CITY OF
Litchfield Park



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January 17, 2014

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Chairman Bob Stump
Commissioner Bob Burns
Commissioner Brenda Burns
Commissioner Gary Pierce
Commissioner Susan Bitter Smith
Arizona Corporation Commission
Commissioners Wing
1200 West Washington
Phoenix, Arizona 85007-2996

WS

Re: Docket Number ~~SW~~-01303A-13-0446
EPCOR Water Arizona, Inc.

Arizona Corporation Commission
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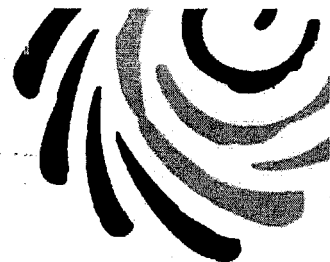
JAN 31 2014

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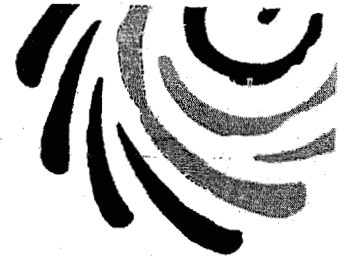
Dear Members of the Arizona Corporation Commission:

As City Manager of the City of Litchfield Park, I was notified in writing by EPCOR Water, Inc. on December 23, 2013, of a pending application before the Commission to expand EPCOR's Aqua Fria Wastewater Service Area. I was also provided with a copy of a report entitled *EPCOR Water Arizona, Loop 303 Wastewater, Maricopa Association of Governments 208 Water Quality Management Plan Amendment Application* (the Report) dated December 2013. City staff has reviewed these documents and offer the following comments and requests of the Commission:

1. The Report indicates that the location of the proposed wastewater treatment plant is within approximately 4,500 feet of the Litchfield Park city limits and residences within the City. This proximity of the plant to residential development within our City is concerning from the standpoint of nuisance factors normally associated with wastewater treatment plants such as odors and noise. The report states that a buffer zone of 350 feet will be provided around the plant. It is our understanding of State requirements that, in order for a buffer this small to be allowed around a wastewater treatment plant, the plant components must be completely enclosed and provided with active noise and odor control facilities. We ask the Commission to require this treatment facility to meet all State requirements and install all other state-of-the-art equipment as necessary to completely eliminate noise, odor and other nuisance impacts on the residents of the City of Litchfield Park.



2. The Report also states that the first phase of the treatment facility will be a packaged plant. We ask the Commission to likewise require that this first phase packaged plant also be completely enclosed and equipped with state-of-the-art noise, odor and nuisance control components.
3. The Report further states that, even before the first phase package plant is placed into operation, the plan is to "vault and haul" the initial sewage flows entering the plant site. The vault and haul operation entails pumping of raw sewage from an underground chamber into tank trucks, which then haul the raw sewage to a nearby wastewater treatment plant for disposal. The Liberty Utilities wastewater treatment plant at 14222 West McDowell Road appears to be the nearest existing treatment facility to the proposed EPCOR plant. The most direct route from the EPCOR site to the Liberty Utilities plant is Camelback Road east to Litchfield Road, then south to McDowell Road. The City of Litchfield Park is concerned about hauling of raw sewage through our City on high-speed arterial streets. We ask the Commission to prohibit the practice of vault and haul of raw sewage for the EPCOR plant. If the Commission decides to allow raw sewage to be hauled to the Liberty Utilities plant, then we ask that the Commission require EPCOR to use a route that prohibits numerous tank trucks full of raw sewage from using the streets within the City of Litchfield Park.
4. When the proposed EPCOR plant becomes operational, it will begin to create sludge from the treatment process. The Report states that this sludge will be hauled to a landfill or placed on agricultural fields for disposal. Our experience is that stabilized land-applied sewage sludge from treatment facilities, such as the one proposed by EPCOR, can still generate odors. We ask the Commission to prohibit the land application of sewage sludge from this facility and, instead, require that all sludge be disposed of in a properly permitted landfill. Further, we ask the Commission to prohibit the hauling of sludge from the EPCOR plant on any streets within the City of Litchfield Park.
5. The Report states that effluent from the plant will be treated to standards that allow it to be discharged into local washes or irrigation district facilities, but there are no details provided regarding the location of the discharge point or the wash that would accept the flow. Since the City of Litchfield Park is located downstream from the plant site, the City requests that the Commission require EPCOR to prepare at this time a plan for the re-use of effluent from the proposed plant that specifically identifies the location of re-use. The City reserves the right to review and have input into the approval of that plan by applicable agencies. In reviewing the location of this plant, we do not believe that there are any washes in the vicinity that can receive a discharge of effluent from this plant.



6. Furthermore, since reclaimed wastewater is a valuable resource that should not be wasted, the City asks the Commission to prohibit any discharge of effluent from the proposed EPCOR plant. On-site storage facilities can be provided to contain excess effluent that cannot be immediately re-use or recharged.
7. Since the proposed EPCOR plant location is up-gradient from the City of Litchfield Park and the Phoenix-Goodyear Airport North Superfund plume of contaminated groundwater, the City asks the Commission to require EPCOR to recharge effluent into the groundwater aquifer in a means designed to provide long-term resistance to the spread of the Plume.

Thank you for consideration of our requests. We are happy to meet and provide you with additional information at your convenience.

Sincerely,

A handwritten signature in black ink, reading "Darryl H. Crossman". The signature is written in a cursive, flowing style.

Darryl H. Crossman
City Manager

cc: Mayor Thomas L. Schoaf
Members of Council
Woody Scoutten, City Engineer